

Superfund

Enforcement Process Overview Course

The *Enforcement Process Overview Course* provides an in-depth overview of the U.S. Environmental Protection Agency's (EPA) Superfund enforcement process for **remedial project managers (RPM), on-scene coordinators (OSC), and others engaged in Superfund enforcement activity**. During 2 ½ days of training, the course covers the following topics:

- T **PRP Liability:** CERCLA liability definition, classes of PRP, liability defenses and exemptions, enforcement discretionary policies, municipal solid waste, prospective purchasers policy.
- T **PRP Search:** PRP search planning and procedures, §104(e) information requests, elements of the PRP search report, PRP search follow-up, administrative subpoenas, site access.
- T **Records Management:** Site files, Administrative Record content and purposes, challenges to the Administrative Record, handling of confidential business information.
- T **Administrative Orders and Procedures:** Administrative law, AOC - UAO comparison, enforcement options, RI/FS settlement negotiations, provisions of §106, penalties.
- T **Judicial Involvement in Superfund:** Judicial law, comparison with administrative law, the court's role in Superfund.
- T **Consent Decree Settlements:** RD/RA settlement objectives, consent decree process, case management, settlement planning and preparations, SNLs and moratoriums, negotiable and non-negotiable provisions, roles of DOJ and headquarters, violations and penalties.
- T **Settlement Tools:** Mixed funding, *de minimis* settlements, *de micromis* settlements, orphan share compensation, special accounts funds, alternative dispute resolution.
- T **Superfund Enforcement: Program Operations:** National Superfund enforcement management; State and Tribal involvement; community relations; federal agencies as trustees; federal agencies as PRPs; enforcement reporting, targets and measures.
- T **Cost Recovery:** Cost recovery process for removals and remedial actions, reimbursement for oversight, statute of limitation deadlines, cost documentation, litigation, bankruptcy.

Exercises, some of them case-study based, are used throughout the course to reinforce the instruction and to stimulate group discussions of particular enforcement procedure applications.

The course is presented **without training fee** by the Policy and Guidance Branch of the Office of Site Remediation Enforcement and is conducted by instructors with extensive field experience.

The Enforcement Process Overview Course is an EPA Order 3500.1 requirement for OSCs, RPMs, and their first line supervisors. Contact: Bob Lindsey, OSRE, 202-564-6078.

Presented in the Spring and Summer of 2002 at

The headquarters of Regions which can assure attendance of at least 20 participants

Attendance is limited to 32 participants. All registrants will receive the CD ROM *Introduction to Superfund Enforcement* with registration confirmation.